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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

TOM HENSIEK, JASON GILL, and)
LILLIAN WROBEL, on behalf of)
themselves individually, and on)
behalf of similarly situated)
participants and beneficiaries of the)
CASINO QUEEN EMPLOYEE)
STOCK OWNERSHIP PLAN,)

Plaintiffs,)

v.)

No.: 3:20-cv-377-DWD

BOARD OF DIRECTORS OF CQ)
HOLIDNG COMPANY, INC. (a/k/a)
CQH BOARD OF DIRECTORS), *et al.*,)

Defendants.)

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE A RESPONSIVE PLEADING**

NOW COMES the Defendant, Shauna Bidwill Valenzuela, by and through her counsel, HEYL, ROYSTER, VOELKER & ALLEN, P.C., and for her UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING until July 15, 2022, states as follows:

1. The Defendant Shauna Bidwill Valenzuela was served on or about May 7, 2022 by a process server leaving a copy of the Summons and First Amended Complaint at her home.
2. The Summons is a 21 day summons, making her responsive pleading due on May 31, 2022 because of weekends and holidays.

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3. Ms. Valenzuela has retained counsel who has entered an appearance.

4. Ms. Valenzuela requests that the Court grant her an extension of time until July 15, 2022 to file a responsive pleading in this matter. This will allow her time to meet with her counsel and evaluate the First Amended Complaint (which consists of over 190 paragraphs leading to one Count filed against her) as well as allowing her counsel an opportunity to review the numerous other pleadings filed in this matter.

5. Counsel for Ms. Valenzuela has communicated with counsel for Plaintiff who has no objection to this request.

6. This request is not meant to delay this matter but to give counsel adequate time to evaluate the First Amended Complaint. Counsel notes that other defendants named in the First Amended Complaint have not all filed responsive pleadings and a review of the court docket indicates that there continues to be motion and third party practice.

7. Accordingly, Ms. Valenzuela respectfully requests that the Court enter an order allowing her until July 15, 2022 to file a responsive pleading in this matter.

WHEREFORE, the Defendant, Shauna Bidwill Valenzuela, respectfully requests that this Unopposed Motion for Extension of Time to File a Responsive Pleading be granted and that she be given until July 15, 2022 to file a responsive pleading.

SHAUNA BIDWILL VALENZUELA, Defendant,

BY: /s/ Ann C. Barron
HEYL, ROYSTER, VOELKER & ALLEN, P.C.
Ann C. Barron, ARDC #6224429

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 31st day of May, 2022, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

/s/ Ann C. Barron